

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
PECOS DIVISION**

UNITED STATES OF AMERICA
Plaintiff(s),

v.

MICHAEL MARK TRAVALINO
AKA “MARK WHITE EAGLE”

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Civil Action No. P:20-CV-0046

**AMENDED ANSWER TO PLAINTIFF’S ORIGINAL COMPLAINT AGAINST
MICHAEL MARK TRAVALINO, AKA “MARK WHITE EAGLE”**

NOW COMES Defendant, Michael Mark Travalino AKA “Mark White Eagle”, and respectfully shows:

1. Defendant DENIES Paragraph 1.
2. Defendant ADMITS Paragraph 2.
3. Defendant DENIES Paragraph 3 in that while not scientifically proven, Defendant in good faith believes his products are efficacious.
4. Defendant ADMITS Paragraph 4.
5. Defendant DENIES Paragraph 5 as to purpose of the website, and ADMITS Paragraph 5 as to accepting orders and payments.
6. Defendant ADMITS Paragraph 6.
7. Defendant ADMITS Paragraph 7 with the exception of “ongoing mail and wire fraud”, which Defendant DENIES.
8. Defendant ADMITS Paragraph 8.
9. Defendant ADMITS Paragraph 9.
10. Defendant ADMITS Paragraph 10.
11. Defendant ADMITS Paragraph 11 as to operating a website, and DENIES

Paragraph 11 as to participating in illegal acts.

12. Defendant ADMITS Paragraph 12.
13. Defendant ADMITS Paragraph 13.
14. Defendant ADMITS Paragraph 14.
15. Defendant ADMITS Paragraph 15.
16. Defendant ADMITS Paragraph 16.
17. Defendant ADMITS Paragraph 17.
18. Defendant ADMITS Paragraph 18.
19. Defendant ADMITS Paragraph 19.
20. Defendant ADMITS Paragraph 20.
21. Defendant ADMITS Paragraph 21.
22. Defendant ADMITS Paragraph 22.
23. Defendant ADMITS Paragraph 23.
24. Defendant ADMITS Paragraph 24.
25. Defendant ADMITS Paragraph 25.
26. Defendant ADMITS Paragraph 26.
27. Defendant ADMITS Paragraph 27.
28. Defendant ADMITS Paragraph 28.
29. Defendant ADMITS Paragraph 29.
30. Defendant ADMITS Paragraph 30.
31. Defendant ADMITS Paragraph 31.
32. Defendant ADMITS Paragraph 32.
33. Defendant ADMITS Paragraph 33.

- 34. Defendant ADMITS Paragraph 34.
- 35. Defendant ADMITS Paragraph 35.
- 36. Defendant ADMITS Paragraph 36.
- 37. Defendant ADMITS Paragraph 37.
- 38. Defendant ADMITS Paragraph 38.
- 39. Defendant ADMITS Paragraph 39.
- 40. Defendant ADMITS Paragraph 40
- 41. Defendant ADMITS Paragraph 41.
- 42. Defendant DENIES Paragraph 42 as to the false and fraudulent claims, and ADMITS Paragraph 42 as to WHO guidelines.
- 43. Defendant DENIES Paragraph 43.
- 44. Defendant DENIES Paragraph 44.
- 45. Defendant ADMITS Paragraph 45.
- 46. Defendant DENIES Paragraph 46.
- 47. Defendant ADMITS Paragraph 47.
- 48. Defendant DENIES Paragraph 48.
- 49. Defendant ADMITS Paragraph 49.
- 50. Defendant DENIES Paragraph 50.

AFFIRMATIVE DEFENSES

Defendant does not claim affirmative defenses at this time. Defendant will supplement his answer if necessary.

PRAYER

Defendant prays that all allegations set forth in Plaintiff's Original Complaint be stricken

or denied in subsequent proceedings, that Plaintiff take nothing, and that Defendant be granted any and all relief as Defendant may be entitled to in law or in equity.

Respectfully submitted,

By: /s/CHARLES S. CHAMBERS

Charles S. Chambers

Texas Bar No. 04067500

Email: charleschambers_540@msn.com

915 Texas Avenue

LUBBOCK, TX 79401

Tel: (806) 763-9900

Fax: (806) 763-9904

Attorney for Defendant

CERTIFICATE OF SERVICE

I certify that on June 30, 2020, a true and correct copy of Defendant's Original Answer was served on United States Assistant Attorney, Eduardo R. Castillo, via federal electronic filing manager and/or facsimile.

/s/CHARLES S. CHAMBERS

Charles S. Chambers